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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 “AURORA”,

11 Plaintiff,

12 v.

13 PATRICK ALLEN SHEELY,

14 Defendant.

15 CASE NO. 16-cv-1358-RSM

16 AFFIDAVIT OF RANDALL L. GREEN,
17 PhD

18 I, Randall L. Green, PhD., being first duly sworn, do hereby depose and say:
19 hereby declares the following to be true and correct under penalty of perjury of the
20 laws of the State of Washington:

21 1. I am a psychologist, licensed by the State of Oregon. A true and correct
22 copy of my Curriculum Vita is attached hereto at Exhibit 1. A substantial part of my
23 practice includes forensic psychological evaluation and testimony.

24
25 CAROL L. HEPBURN, P.S.

ATTORNEYS AT LAW

200 FIRST AVENUE WEST, SUITE 550

SEATTLE, WA 98119

TEL: (206) 957-7272 / FAX: (206) 957-7273

1 2. I was contacted by attorney Carol Hepburn to provide a forensic
2 psychological evaluation and make treatment recommendations for the young woman
3 who is the subject of the "LJ" series of child pornography images. I met with "Aurora" in
4 her home, conducted collateral interviews, reviewed medical, counseling and school
5 records, as well as records of the criminal prosecution of her original perpetrator. My
6 psychological evaluation was completed in August 19, 2014. A Copy of my report,
7 redacted to protect her identity, is attached at Exhibit 2.

8 3. I have found throughout my work with "Aurora" that she has been a
9 reliable and consistent historian, not given to exaggeration or hyperbole. She is
10 focused on moving forward with her life. While she carries a heavy burden of
11 unresolvable stress due to the presence of her images of her abuse on the internet
12 and the consumption of these images by Mr. Sheely and others, she is doing her best
13 to make a normal life for herself. She is an intelligent and sensitive individual who
14 finds significance in the fact of distribution of her images on the internet as they relate
15 to her personal safety and the continuing problem of child pornography consumption
16 as a whole. She has suffered separate, identifiable personal injury as a result of each
17 crime against her.

18 I am over the age of 18 years and am competent to testify to all matters
19 set forth herein, which statements are also based upon my personal knowledge.

20 DATED this 29th day of Dec., 2016.



21 Randall L. Green, Ph.D.
22

23 CAROL L. HEPBURN, P.S.
24 ATTORNEYS AT LAW
25 200 FIRST AVENUE WEST, SUITE 550
AFFIDAVIT OF RANDALL L. GREEN, PHD - 2 SEATTLE, WA 98119
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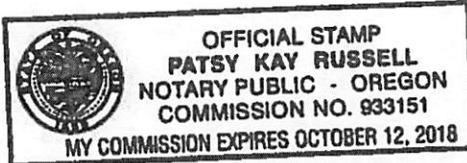
1 STATE OF Oregon:

2 : ss:

3 COUNTY OF MARION:

4 I certify that I know or have satisfactory evidence that Randall L. Green Ph.D.
5 signed this instrument, on oath, and acknowledged it as his/her free and voluntary act
6 of such party for the uses and purposes mentioned in the instrument.

7 Dated this 29th day of Dec., 2016.



Patsy Kay Russell /Patsy Kay Russell

Type/printed name:

Notary Public in and for the State of
OREGON

My commission expires: 10-12-18

1 CERTIFICATE OF SERVICE
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I, Carol L. Hepburn, being first duly sworn on oath, depose and state:
That at all times mentioned herein I was over 18 years of age; that I caused to be
served via electronic mail and U.S. Mail, postage prepaid, a true and correct copy of
the foregoing document, to the parties as follows:

Alexei C. Garick, WSBA No. 50962
David S. Marshall, WSBA No. 11716
THE MARSHALL DEFENSE FIRM
1001 Fourth Avenue, 44th Floor
Seattle, WA 98165
206-826-1400
206-826-1462 fax
alexei@marshalldefense.com

Attorneys for Defendant Sheely

DATED this 29th day of December, 2016.

CAROL L. HEPBURN, P.S.

By: /s Carol L. Hepburn
By: /s J. William Savage
Carol L. Hepburn, WSBA No. 8732
J. William Savage, WSBA No. 32148
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Of Attorneys for Plaintiff